



**STATE OF CONNECTICUT  
DEPARTMENT OF REHABILITATION SERVICES**

**Testimony before the Human Services Committee  
Commissioner Amy L. Porter**

**House Bill 5321 - An Act Concerning Interpreter Qualifications  
March 13, 2014**

Good morning Senator Slossberg, Representative Abercrombie and distinguished members of the Human Services Committee.

Thank you for the opportunity to share the Department of Rehabilitation Services' perspective on Raised Bill 5321, An Act Concerning Interpreter Qualifications.

Overall, we support the intent of the bill. It aligns the state's interpreter qualifications with those of the national certifying organizations. It also provides a long-term opportunity to increase the number of qualified interpreters available in specific types of settings, such as medical, legal and educational settings. It also provides some clarity of expectations within certain settings. I know there are numerous individuals and organizations who have been involved in the development of this proposal and I appreciate their efforts to continuously improve our interpreting service structure.

On a more detailed level, we wanted to share some considerations about costs and timelines. Before addressing the specific sections, one overarching suggestion relates to the global nature of the term "interpreting". It might be helpful to specify up front that the interpreting services described involve only those interpreting services used for communication with individuals who are deaf or hard of hearing.

In the definitions section, we have one primary concern regarding the definition of medical setting in Section 1(a)(7). Because the language about the settings is vague, it may apply to more settings than intended. For instance, if a Vocational Rehabilitation Counselor is working on developing an employment plan with a job seeker with a disability, they will be discussing health and disability issues. There is some concern that this could be construed as a medical setting, which we do not believe is the intent of the language change.

In section 1(b), the statute describes the need for all interpreters to register annually with our Department. This seems to include interpreters who are working in Connecticut through agencies operated from states outside Connecticut, including those who are interpreting through the Video Relay Service. Our department has some concerns about enforcement of this requirement.

In section 1(c), the proposal adds the collection of a registration fee beginning on October 14, 2014. We believe that there will be a cost associated with this requirement, given that additional staffing would be necessary to establish a fee schedule, collect fees, assess penalties, etc. It is unclear how the fee will be assessed for interpreters who are State of Connecticut employees. This same section also requires the creation, printing and dissemination of brochures, and the provision of related education and training. The proposal contemplates that these costs will all be covered by the fees collected, but there is no consideration for startup costs or estimates of the level of fees that would be required to meet the expectations outlined in the bill.

In Section 1(e) and (f), the proposal adds training requirements for work in legal and medical settings. While we understand the intent, there are some considerations. In terms of cost, it is unclear how the training costs will be paid for interpreters who are State of Connecticut employees. Also, if implemented, we believe that we need to consider a timeframe for implementation that does not adversely impact service delivery. If we make these requirements effective immediately, the pool of interpreters qualified to work in these settings will decrease and result in fewer interpreter assignments being filled. The pool of interpreters qualified to work in these settings is already limited.

Section 2 is a new section that requires our Department to appoint an Interpreting Standards and Monitoring Board. This would create additional costs for our Department in terms of coordinating meetings, completing and posting meeting agendas and minutes, working with other agencies to develop an appropriate fee schedule, and, as mentioned previously, the assessment of penalties and the collection of fees and penalties. Additionally, we are not clear whether the board would be made up of volunteers and would need information on associated costs that might be incurred such as travel, interpreting services, and other accommodations. Given that there are no funds allocated for this activity, we oppose the inclusion of this component in the bill.

Again, I'd like to thank the committee for inviting me to testify today, and our Department looks forward to working with you on a realistic implementation timeline for the provisions of this bill that are cost-neutral.